

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**JOSE MOURA, SR., PERSONAL
REPRESENTATIVE OF THE ESTATE OF JOSE
MOURA, JR., LORI TURNER, AS PARENT AND
NEXT FRIEND OF MINOR PLAINTIFFS A.M., C.
M., AND J. M., LORI TURNER, INDIVIDUALLY**

**PLAINTIFFS,
V.**

**NEW PRIME, INC., BARBARA CANNON,
ADMINSTRATOR OF THE ESTATE OF JOHN
PAUL CANNON, SUCCESS LEASING, INC.;
ECOTIRE TREADING, CO, LLC; WOLVERINE
LAND HOLDINGS, LLC; PRIME FLORAL, LLC.;
CAMPUS, INC., and L.H.P. TRANSPORTATION
SERVICES, INC.**

DEFENDANTS.

Civil Action No.: 17-40166

STIPULATION OF DISMISSAL

Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), the parties, through their respective counsel, hereby agree and stipulate that any and all claims in this action by and/or against defendants EcoTire Treading, Co., LLC, Wolverine Land Holdings, LLC, Campus, Inc., and L.H.P. Transportation Services, Inc. shall be dismissed with prejudice and without costs, each party bearing its own attorneys' fees, and with all rights of appeal waived. The remaining parties' claims are preserved.

Respectfully submitted,
Plaintiffs,

JOSE MOURA, SR., PERSONAL
REPRESENTATIVE OF THE ESTATE OF
JOSE MOURA, JR., LORI TURNER, AS
PARENT AND NEXT FRIEND OF MINOR
PLAINTIFFS A.M., C. M., AND J. M., LORI
TURNER, INDIVIDUALLY

By their Attorney,

/s/ Donald R. Grady, Jr.

Donald R. Grady, Jr., Esq. (BBO# 544841)
Matthieu J. Parenteau, Esq. (BBO# 679941)
(BBO# 679941)
10 Tremont Street, 7th Floor
Boston, Massachusetts 02108
(P) 617.227.7000
MParenteau@shefflaw.com

Respectfully submitted,
Defendants,

NEW PRIME, INC., BARBARA
CANNON, ADMINSTRATOR OF THE
ESTATE OF JOHN PAUL CANNON,
SUCCESS LEASING, INC.; ECOTIRE
TREADING, CO, LLC; WOLVERINE
LAND HOLDINGS, LLC; PRIME
FLORAL, LLC.; CAMPUS, INC., and
L.H.P. TRANSPORTATION SERVICES,
INC.

By their attorney,

/s/ Andrew J. Fay

Andrew J. Fay, Esq., BBO #550058
FAY LAW GROUP, LLC
One Boston Place, Suite 2600
Boston, MA 02108
Phone: (617) 826-6006
Email: afay@faylawgrp.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 21, 2020.

/s/ Andrew J. Fay